

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNILOC 2017 LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civil Action No. 2:18-cv-00505-JRG

JURY TRIAL DEMANDED

**DECLARATION OF ELIZABETH WEYL IN SUPPORT OF
CISCO SYSTEMS, INC.'S MOTION TO TRANSFER VENUE TO THE
SOUTHERN DISTRICT OF NEW YORK PURSUANT TO A
FORUM SELECTION CLAUSE IN A PRIOR LICENSE AGREEMENT**

I, Elizabeth Weyl, hereby declare as follows:

1. I am an associate with Desmarais LLP, which represents Defendant Cisco Systems, Inc. ("Cisco") in the above-captioned action. I am admitted *pro hac vice* in the above-captioned action, and I submit this declaration in support of Cisco's motion to transfer venue to the Southern District of New York. I declare the following statements are true to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Bluetooth Patent/Copyright License Agreement ("PCLA") identified with bates BTSIG007-BTSIG014 as produced by Bluetooth SIG, Inc. ("Bluetooth SIG") in response to a third party subpoena from Cisco.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Fourth Amended and Restated Certification of Incorporation of Bluetooth SIG, Inc., downloaded from Bluetooth SIG's website www.bluetooth.com.

4. Attached hereto as Exhibit 3 is a true and correct copy of a screenshot from Bluetooth SIG's internal CRM database identifying membership information of Koninklijke Philips N.V. and Cisco, identified with bates BTSIG001 as produced by Bluetooth SIG in response to a third party subpoena from Cisco.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Bylaws of Bluetooth SIG, Inc., downloaded from Bluetooth SIG's website www.bluetooth.com.

6. Attached hereto as Exhibit 5 is a true and correct copy of an Agreement and Stipulation For Dismissal Of Action filed in *Azure Networks, LLC v. CSR PLC, et al.*, Case Number 6:11-CV-139-RWS-JDL, Docket Number 323, downloaded from PACER.

7. Attached hereto as Exhibit 6 is a true and correct copy of the assignment of U.S. Patent No. 6,664,891 from the inventors to Koninklijke Philips Electronics N.V., as produced by Plaintiff with bates UNI-C-505_0000372- UNI-C-505_0000373.

8. Attached hereto as Exhibit 7 is a true and correct copy of the assignment of U.S. Patent No. 6,664,891 from Koninklijke Philips Electronics N.V. to IPG Electronics 503 Limited, as produced by Plaintiff with bates UNI-C-505_0000374- UNI-C-505_0000424.

9. Attached hereto as Exhibit 8 is a true and correct copy of the assignment of U.S. Patent No. 6,285,892 from the inventor to Philips Electronics North America Corporation, as produced by Plaintiff with bates UNI-C-505_0000546- UNI-C-505_0000547.

10. Attached hereto as Exhibit 9 is a true and correct copy of the assignment of U.S. Patent No. 6,285,892 from Philips Electronics North America Corporation to IPG Electronics 503 Limited, as produced by Plaintiff with bates UNI-C-505_0000425-UNI-C-505_0000435.

11. Attached hereto as Exhibit 10 is a true and correct copy of Plaintiff's Disclosure of Asserted Claims and Infringement Contentions Against Cisco, served on March 4, 2019.

12. Attached hereto as Exhibit 11 is a true and correct copy of the Specification of the Bluetooth System, Version 4.0.

13. Attached hereto as Exhibit 12 is a true and correct copy of a printout of the entity information for Cisco from the New York State Department of State, Division of Corporations, Search Our Corporation and Business Entity Database (https://appext20.dos.ny.gov/corp_public/corpsearch.entity_search_entry).

14. Attached hereto as Exhibit 13 is a true and correct copy of a printout from cisco.com of Cisco's Customer Experience Centers.

15. Attached hereto as Exhibit 14 is a true and correct copy of Uniloc 2017 LLC's Application to Register a Foreign Limited Liability Company, downloaded from the California Secretary of State's Business Search website (<https://businesssearch.sos.ca.gov/>).

16. Attached hereto as Exhibit 15 is a true and correct copy of a printout from the Texas Comptroller of Public Accounts, Taxable Entity Search (<https://mycpa.cpa.state.tx.us/coa/>) of the results from searching for "Uniloc".

17. Attached hereto as Exhibit 16 is a true and correct copy of a printout from the State of Delaware, Department of State: Division of Corporation website (<https://icis.corp.delaware.gov/Ecorp/EntitySearch/NameSearch.aspx>) of entity details for Uniloc 2017 LLC.

18. Attached hereto as Exhibit 17 is a true and correct copy of a printout from the State of Delaware, Department of State: Division of Corporation website (<https://icis.corp.delaware.gov/Ecorp/EntitySearch/NameSearch.aspx>) of entity details for CF Uniloc Holdings LLC.

19. Attached hereto as Exhibit 18 is a true and correct copy of an agreement between Koninklijke Philips Electronics N.V., IPG Electronics 503 Limited, and Collier International Partners V-A L.P., identified with bates PHILIPS00000001-PHILIPS00000053 produced by Philips North America LLC.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 24, 2019 in New York, New York.

By: /s/ Elizabeth Weyl
Elizabeth Weyl